

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LUZ TAMAYO,

Plaintiff,

V.

AMERICAN CORADIOUS
INTERNATIONAL, LLC

Defendant.

Case No. 2:11-cv-06549-JLL

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on a date and time to be set by the Court, counsel for Defendant, American Coradious International, LLC (ACI), shall move for entry of an Order dismissing Plaintiff's Complaint for failure to state a claim upon which relief may be granted, pursuant to Fed. R. Civ. P. 12(b)(6). ACI states the following in support of its motion:

1. September 28, 2011, Plaintiff filed the instant action, founded upon alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, and an invasion of privacy, in the Superior Court of New Jersey, Law Division, Special Civil Part, Hudson County.
2. On November 4, 2011, ACI removed the suit to this Court.
3. Plaintiff fails to allege any facts to support her claims for relief.

4. As a result, Defendant contends Plaintiff's claims should be dismissed for failure to state a claim upon which relief can be granted, pursuant to Fed. R. Civ. P. 12(b)(6).

Dated: November 22, 2011.

Respectfully Submitted,

/s/ Aaron R. Easley

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Attorney for Defendant

American Coradious International, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November 2011, a copy of **American Coradious International, LLC's Notice of Motion** was filed electronically and served via ECF upon the following:

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